

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Stephanie Kay Krupin

Debtor(s)

Chapter 13

VFS Xanthos, LLC

Movant

NO. 18-04321 JJT

vs.

Stephanie Kay Krupin

11 U.S.C. Section 362

Debtor(s)

Charles J. DeHart, III Esq.

Trustee

Request for Continuance

OR
WILKES-BARR
FILED
2019 JAN 10 PM 3:12
CLERK U.S. BANKRUPTCY COURT

1. Debtor is Stephanie Krupin
2. Movant is VFS Xanthos, LLC
3. Debtor is the owner of the premises 3545 High Crest Road, Canadensis, PA 18325, hereinafter referred to as the mortgaged premises.
4. Movant is the holder of a mortgage, original principal amount of \$100,870.00 on the Mortgaged Premises that was executed on August 10, 2016. Said mortgage was recorded on August 24, 2016 at Book 2476, Page 8826. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on November 17, 2016, at Book 2481, Page 7644 in Monroe County.

5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non- payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor.
6. A Notice of Motion for Relief From Stay has been filed by the Movant.
7. An Answer to the Motion for Relief from Stay has been filed by the Debtor on January 10, 2019
8. A hearing on the Motion for Relief from Stay is scheduled for January 15, 2019
9. Debtor is requesting continuance on the hearing date scheduled for January 15, 2019
10. Debtor requests the continuance in order to retain legal council for the hearing now that an additional Motion has been filed.
11. Debtor is in the process of obtaining legal council for the hearing and requests additional time to prepare the case

WHEREFORE Debtor prays for a continuance on the hearing to stop the Motion for Relief from the Automatic Stay, in order to permit Debtor to obtain appropriate legal council for the upcoming hearing.

Date: January 10, 2019



Stephanie Krupin
Debtor
3545 High Crest Road
Canadensis, PA 18325